



U.S. Department of Justice

United States Attorney
 Southern District of New York

The Silvio J. Mollo Building
 One Saint Andrew's Plaza
 New York, New York 10007

October 4, 2021

BY ECF

The Honorable Lorna G. Schofield
 United States District Judge
 Southern District of New York
 Thurgood Marshall U.S. Courthouse
 40 Foley Square
 New York, New York 10007

Re: *United States v. Thomas Parker, et al., 21 Cr. 587 (LGS)*

Dear Judge Schofield:

The parties respectfully submit this joint letter in accordance with the Court's September 29, 2021 order. (Dkt. 9.) The Government expects that the defendants will be arraigned on or after October 13, 2021. The parties therefore jointly propose the following schedule:

- Government production of discovery: October 26, 2021
- Defense motions: January 10, 2022
- Government response: January 24, 2022
- Pretrial conference: January 27, 28, or February 1, 2022

In light of the Government's need to produce discovery and the need for the defense to review discovery, the Government moves for the exclusion of time under the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(1)(D) and (h)(7)(A), until approximately February 1, 2021 or any alternative date for an initial pretrial conference established by the Court. The exclusion of time will afford the Government time to produce discovery, the defendants time to review discovery, and consult with counsel, and will permit the parties to engage in discussions regarding the potential for a pretrial disposition. The defense consents to this application.

Application Granted in part. Rule 16 discovery shall be completed by **October 26, 2021**. Defendants' motion(s), if any, shall be filed by **January 10, 2022**. The Government's response, if any, shall be filed by **January 24, 2022**. Defendants' reply, if any, shall be filed by **January 31, 2022**. The parties shall appear for a status conference on **February 24, 2022, at 11:15 a.m.** For the reasons stated above, the Court finds that the ends of justice served by excluding the time between today and February 24, 2022, outweigh the best interests of the public and the Defendants in a speedy trial as provided in 18 U.S.C. 3161(h)(7)(A). It is hereby ORDERED that the time between today and February 22, 2022, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 10.

Respectfully submitted,

AUDREY STRAUSS
 United States Attorney

By: _____ /s/
 Mitzi S. Steiner
 Assistant United States Attorney

LORNA G. SCHOFIELD
 UNITED STATES DISTRICT JUDGE